

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

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AMERICAN ZURICH INSURANCE )  
COMPANY and ZURICH AMERICAN )  
INSURANCE COMPANY, )  
Plaintiffs, ) Case No. 20-cv-5026  
v. )  
J. CRISMAN PALMER and GUNDERSON, )  
PALMER, NELSON & ASHMORE, LLP, )  
Defendants. )  
)  
STATE OF SOUTH DAKOTA )  
:ss  
COUNTY OF MINNEHAHA )

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**AFFIDAVIT OF KRISTIN N. DERENGE  
DATED FEBRUARY 1, 2023**

STATE OF SOUTH DAKOTA )

:ss

COUNTY OF MINNEHAHA )

1. I am one of the attorneys representing the Defendants, J. Crisman Palmer and Gunderson, Palmer, Nelson & Ashmore, LLP, in the above-captioned matter.

2. The attachments to this affidavit are deposition transcripts and deposition exhibits in this matter. For the Court's ease of reference, the exhibits continue the same numbering as their numbering during the depositions.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the excerpts of the relevant portions of the deposition transcript of J. Crisman Palmer in the above-entitled matter.

4. Attached hereto as **Exhibit B** is a true and accurate copy of the excerpts of the relevant portions of the deposition transcript of Mike Abourezk in the above-entitled matter.

5. Attached hereto as **Exhibit C** is a true and accurate copy of the excerpts of the relevant portions of the deposition transcript of Bill Fuller in the above-entitled matter.

6. Attached hereto as **Exhibit D** is a true and accurate copy of the excerpts of the relevant portions of the deposition transcript of Dawn Wagner in the above-entitled matter.
7. Attached hereto as **Exhibit E** is a true and accurate copy of the excerpts of the relevant portions of the deposition transcript of Paris Glazer in the above-entitled matter.
8. Attached hereto as **Exhibit F** is a true and accurate copy of the excerpts of the relevant portions of the deposition transcript of Colin F. Campbell in the above-entitled matter.
9. Attached hereto as **Exhibit 1** is deposition exhibit 1 in the above-entitled matter.
10. Attached hereto as **Exhibit 2** is deposition exhibit 2 in the above-entitled matter.
11. Attached hereto as **Exhibit 5** is deposition exhibit 5 in the above-entitled matter.
12. Attached hereto as **Exhibit 6** is deposition exhibit 6 in the above-entitled matter.
13. Attached hereto as **Exhibit 8** is deposition exhibit 8 in the above-entitled matter.
14. Attached hereto as **Exhibit 9** is deposition exhibit 9 in the above-entitled matter.
15. Attached hereto as **Exhibit 13** is deposition exhibit 13 in the above-entitled matter.
16. Attached hereto as **Exhibit 15** is deposition exhibit 15 in the above-entitled matter.
17. Attached hereto as **Exhibit 16** is deposition exhibit 16 in the above-entitled matter.
18. Attached hereto as **Exhibit 19** is deposition exhibit 19 in the above-entitled matter.
19. Attached hereto as **Exhibit 20** is deposition exhibit 20 in the above-entitled matter.
20. Attached hereto as **Exhibit 21** is deposition exhibit 21 in the above-entitled matter.
21. Attached hereto as **Exhibit 22** is deposition exhibit 22 in the above-entitled matter.
22. Attached hereto as **Exhibit 23** is deposition exhibit 23 in the above-entitled matter.
23. Attached hereto as **Exhibit 24** is deposition exhibit 24 in the above-entitled matter.
24. Attached hereto as **Exhibit 25** is deposition exhibit 25 in the above-entitled matter.
25. Attached hereto as **Exhibit 28** is deposition exhibit 28 in the above-entitled matter.

26. Attached hereto as **Exhibit 30** is deposition exhibit 30 in the above-entitled matter.
27. Attached hereto as **Exhibit 31** is deposition exhibit 31 in the above-entitled matter.
28. Attached hereto as **Exhibit 32** is deposition exhibit 32 in the above-entitled matter.
29. Attached hereto as **Exhibit 33** is deposition exhibit 33 in the above-entitled matter.
30. Attached hereto as **Exhibit 44** is deposition exhibit 44 in the above-entitled matter.
31. Attached hereto as **Exhibit 45** is deposition exhibit 45 in the above-entitled matter.
32. Attached hereto as **Exhibit 47** is deposition exhibit 47 in the above-entitled matter.
33. Attached hereto as **Exhibit 49** is deposition exhibit 49 in the above-entitled matter.
34. Attached hereto as **Exhibit 50** is true and accurate copy of the excerpts of the relevant portions of deposition exhibit 50 in the above-entitled matter.
35. Attached hereto as **Exhibit 51** is deposition exhibit 51 in the above-entitled matter.
36. Attached hereto as **Exhibit 52** is true and accurate copy of the excerpts of the relevant portions of deposition exhibit 52 in the above-entitled matter.
37. Attached hereto as **Exhibit 54** is deposition exhibit 54 in the above-entitled matter.
38. Attached hereto as **Exhibit 56** is deposition exhibit 56 in the above-entitled matter.
39. Attached hereto as **Exhibit 57** is true and accurate copy of the excerpts of the relevant portions of deposition exhibit 57 in the above-entitled matter.
40. Attached hereto as **Exhibit 61** is deposition exhibit 61 in the above-entitled matter.
41. Attached hereto as **Exhibit 62** is deposition exhibit 62 in the above-entitled matter.
42. Attached hereto as **Exhibit 64** is deposition exhibit 64 in the above-entitled matter.
43. Attached hereto as **Exhibit 65** is deposition exhibit 65 in the above-entitled matter.
44. Attached hereto as **Exhibit 67** is deposition exhibit 67 in the above-entitled matter.
45. Attached hereto as **Exhibit 72** is deposition exhibit 72 in the above-entitled matter.

46. Attached hereto as **Exhibit 74** is deposition exhibit 74 in the above-entitled matter.
47. Attached hereto as **Exhibit 76** is deposition exhibit 76 in the above-entitled matter.
48. Attached hereto as **Exhibit 77** is deposition exhibit 76 in the above-entitled matter.
49. Attached hereto as **Exhibit 82** is deposition exhibit 82 in the above-entitled matter.
50. Attached hereto as **Exhibit 84** is deposition exhibit 84 in the above-entitled matter.
51. Attached hereto as **Exhibit 88** is deposition exhibit 88 in the above-entitled matter.
52. Attached hereto as **Exhibit 89** is deposition exhibit 89 in the above-entitled matter.
53. Attached hereto as **Exhibit 90** is deposition exhibit 90 in the above-entitled matter.
54. Attached hereto as **Exhibit 91** is deposition exhibit 91 in the above-entitled matter.
55. Attached hereto as **Exhibit 96** is deposition exhibit 96 in the above-entitled matter.
56. Attached hereto as **Exhibit 97** is deposition exhibit 97 in the above-entitled matter.
57. Attached hereto as **Exhibit 99** is deposition exhibit 99 in the above-entitled matter.
58. Attached hereto as **Exhibit 102** is deposition exhibit 102 in the above-entitled matter.
59. Attached hereto as **Exhibit 103** is deposition exhibit 103 in the above-entitled matter.
60. Attached hereto as **Exhibit 104** is deposition exhibit 104 in the above-entitled matter.
61. Attached hereto as **Exhibit 114** is deposition exhibit 104 in the above-entitled matter.
62. Attached hereto as **Exhibit 115** is deposition exhibit 115 in the above-entitled matter.

63. Attached hereto as **Exhibit 116** is deposition exhibit 116 in the above-entitled matter.

64. Attached hereto as **Exhibit 117** is deposition exhibit 116 in the above-entitled matter.

65. Attached hereto as **Exhibit 118** is deposition exhibit 116 in the above-entitled matter.

66.

67. Attached hereto as **Exhibit 119** is deposition exhibit 119 in the above-entitled matter.

Dated this 1<sup>st</sup> day of February, 2023.

Kristin N. Derenge  
Kristin N. Derenge

Subscribed and sworn to before me  
this 1<sup>st</sup> day of February, 2023.

Tricia Ann Johnson  
Notary Public – South Dakota  
My commission expires: 5/9/2024

